



CHICAGO • HOUSTON

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April 29, 2019

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VIA Regular Mail & ECF

Hon. Paul A. Crotty
United States District Court Judge
Southern District of New York
500 Pearl Street, Chambers 1350
New York, New York 10007

Re: Federal Insurance Co., et al. v. Harvey Weinstein, 1:18-cv-02526-PAC (RWLx)

Dear Judge Crotty:

As per the court's March 28, 2019 order, we met and conferred with Harvey Weinstein's new counsel, Jeffrey Schulman of Pasich LLP, and agreed on the following schedule for a brief period of discovery and supplemental briefing limited to the question of choice of law for each of the Chubb policies:

- Serve document requests and interrogatories: June 5
- Produce documents and respond to interrogatories: July 5
- Commence deposition discovery: July 22
- Complete discovery: September 5
- Supplemental briefs due: October 7
- Reply briefs due: October 21

We have also attached a proposed order incorporating this agreed schedule for your convenience. Please let us know if you need any additional information or have any questions.

Hon. Paul A. Crotty

April 29, 2019

Page | 2

Respectfully submitted,

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cc: All Counsel of Record (via ECF)

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
FEDERAL INSURANCE COMPANY, et al.

Plaintiffs,
-against-

HARVEY WEINSTEIN,
Defendant.

1:18-cv-02526-PAC (RWLx)

HARVEY WEINSTEIN,

Counterclaimant,
-against-

FEDERAL INSURANCE COMPANY, CHUBB
INDEMNITY INSURANCE COMPANY,
PACIFIC INDEMNITY INSURANCE
COMPANY, and GREAT NORTHERN
INSURANCE COMPANY,

Counter-Defendants.

**[PROPOSED] SCHEDULING
ORDER**

HARVEY WEINSTEIN,

Third-Party Plaintiff,

-against-

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA, et al.

Third-Party Defendants.

The parties are to conduct further discovery pertaining to the choice of law issues raised by and in accordance with the Order of this Court dated March 28, 2019 [Dkt. 129], and are to comply with the following deadlines:

- | | |
|--|-------------------|
| a. Requests for production of documents and interrogatories are to be served by: | June 5, 2019 |
| b. Parties to produce documents and respond to interrogatories: | July 5, 2019 |
| c. Parties to commence deposition discovery: | July 22, 2019 |
| d. Parties to complete choice of law discovery: | September 5, 2019 |
| e. Parties to file supplemental briefs in regard to Federal's Motion for Summary Judgment: | October 7, 2019 |
| f. Parties to file reply briefs in regard to Federal's Motion for Summary Judgment: | October 21, 2019 |

IT IS SO ORDERED this ____ day of _____, 2019

Paul A. Crotty
United States District Court Judge